



# MIRANDA SLONE SKLARIN VERVENIOTIS LLP

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June 2, 2023

**BY ECF**

Magistrate Judge Peggy Kuo  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Courtroom 11C South  
Brooklyn, New York 11201

Re: Falls Lake Nat'l Ins. Co.v. Kalnitech Constr. Corp. et. al.  
Docket No: 1:22-cv-01473-KAM-PK  
Our File No: 19-208

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Dear Judge Kuo,

I represent the plaintiff, Falls Lake National Insurance Company ("Falls Lake"), in the above-referenced action. I write to the Court, with consent of all parties in the above-referenced action, to request that the court-annexed mediation, scheduled for July 17, 2023, and the filing of a joint status report regarding the result of that mediation by July 24, 2023, be extended 90 days. The parties have tried to work with the chosen mediator and the attorneys in the underlying action as well in order to set a date for mediation, and we initially thought that we would be able to conduct a mediation in July, but that is now not possible, because of conflicts and limited availability of the mediation. We are now looking into possibly other mediators and have conferred amongst counsel and with Judge Matsumoto on the matter as per the minute entry filed today by Judge Matsumoto. Since requests for pre-motion conference has been rescheduled by Judge Matsumoto, in order to allow for mediation before resubmission of the request, we ask for

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**LETTER TO JUDGE KUO, FALLS LAKE NAT'L INS. CO.V. KALNITECH CONSTR. CORP. ET. AL., CIV. NO. 1:22-CV-01473**

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the 90 day extension in order to attempt mediation before filing another request for pre-motion conference.

Respectfully submitted,  
**MIRANDA SLONE SKLARIN VERVENIOTIS LLP**

s/Steven Verveniots

Steven Verveniots

cc: All counsel of record by ECF